## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Anthony Persaud, Adrian Holder, and Romano Chotkoe, on behalf of themselves and others similarly situated in the proposed FLSA Collective Action,

Index No.: 1:21-cv-08115

**AFFIRMATION SERVICE** 

**OF** 

Plaintiffs,

-against-

Adirondacks Protection Services, LLC, Colin Blackman, Ronald Williams, and Collin James,

Defendants.

JOSHUA D. LEVIN-EPSTEIN, ESQ., an attorney duly admitted to practice law in the State of New York, hereby declares that pursuant to Pursuant to S.D.N.Y. Local Civil Rule 55.2(c), that on March 24, 2022, I have served a copy of Plaintiff Anthony Persaud, Adrian Holder, and Romano Chotkoe's (collectively, "Plaintiffs"): (i) Notice of Motion, dated March 14, 2022; (ii) the Declaration of Jason Mizrahi, Esq., dated March 14, 2022, and the exhibits annexed thereto; (iii) the affidavit of Anthony Persaud, dated March 14, 2022; (iv) the affidavit of Adrian Holder, dated March 14, 2022; (v) the affidavit of Romano Chotkoe, dated March 14, 2022, in support of Plaintiffs' motion for default judgment against Defendants Adirondacks Protection Services, LLC (the "Corporate Defendant"), Colin Blackman, Ronald Williams, and Collin James (collectively, the "Individual Defendants", and together with the Corporate Defendant, the "Defendants"); (vi) the Order To Show Cause dated March 18, 2022; and (vii) the Order To Show Cause dated March 24, 2022 pursuant to Federal Rule of Civil Procedure ("Fed.R.Civ.P.") 55(b), S.D.N.Y. Local Civil Rule ("LCR") 55.2(b) and the Honorable District Judge Valerie E. Caproni's Individual Practices Rule 3(K), by sending the same by Priority Mail Signature Required and Certified Mail, addressed to the last known address of the recipient(s) as indicated below and upon information and belief, none of the

aforesaid persons is in the military service as defined by the Act of Congress known as the "Soldiers' and Sailors' Civil Relief Act" of 1940 and in the New York "Soldiers' and Sailors' Civil Relief Act."

Colin Blackman 416 Vermont Street Brooklyn, NY 11207

Collin James 416 Vermont Street Brooklyn, NY 11207

Ronald Williams 416 Vermont Street Brooklyn, NY 11207

Adirondacks Protection Services LLC 416 Vermont Street Brooklyn, NY 11207

Dated: New York, New York March 25, 2022

By: /s/ Joshua Levin-Epstein, Esq.

Joshua Levin-Epstein, Esq. Levin Epstein & Associates, P.C. 60 East 42<sup>nd</sup> Street, Suite 4700

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Attorneys for Plaintiff

Cc: All parties via ECF